

Russell A. Nevers (Utah Bar No. 13940)  
FREEMAN LOVELL, PLLC  
4568 S Highland Drive, Suite 290  
Salt Lake City, Utah 84117  
Telephone: (385) 355-4826  
Email: russ@freemanlovell.com

Robert Henneke (Admitted Pro Hac Vice)  
Matthew Miller (Admitted Pro Hac Vice)  
Nate Curtisi (Admitted Pro Hac Vice)  
Chance Weldon (Admitted Pro Hac Vice)  
TEXAS PUBLIC POLICY FOUNDATION  
901 Congress Avenue  
Austin, Texas 78701  
Telephone: (512) 472-2700  
Email: rhenneke@texaspolicy.com  
mmiller@texaspolicy.com  
ncurtisi@texaspolicy.com  
cweldon@texaspolicy.com

*Attorneys for Plaintiffs*

---

**THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

---

BLUERIBBON COALITION, INC.;  
PATRICK MCKAY; and COLORADO  
OFFROAD TRAIL DEFENDERS,

Plaintiffs,

v.

BUREAU OF LAND MANAGEMENT, U.S.  
DEPARTMENT OF THE INTERIOR,

Defendants.

James Rogers (Utah Bar No. 18783)  
Nicholas Barry (Admitted Pro Hac Vice)  
AMERICA FIRST LEGAL FOUNDATION  
611 Pennsylvania Ave, SE #231  
Washington, DC 20003  
Telephone: (202) 964-3721  
Email: nicholas.barry@aflegal.org  
james.rogers@aflegal.org

**NOTICE OF SUBSTITUTION OF  
COUNSEL FOR PLAINTIFFS**

Civil No. 2:23-cv-00923-DAK

Honorable Dale A. Kimball

Attorney Krystaly N. Koch (Utah Bar No. 16491) of the law firm of Freeman Lovell, PLLC, hereby enters her appearance on behalf of Plaintiffs BlueRibbon Coalition, Inc., Patrick McKay, and Colorado Offroad Trail Defenders in the above-captioned action in place of Attorney Russell A. Nevers. Ms. Koch is aware of and will comply with all pending deadlines.

Dated April 16, 2024

FREEMAN LOVELL, PLLC

/s/ Krystaly N. Koch  
Krystaly N. Koch

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2024, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court for the District of Utah by using the CM/ECF system, which will serve a copy of same on all counsel of record.

/s/ Krystaly N. Koch  
Krystaly N. Koch